

EXHIBIT 5 - 1

JARED GOETZ

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Jared Goetz, 4904 Avenida Oriente, Tarzana, CA 91356

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

instructions the DOCUMENT was destroyed or otherwise disposed of, and the date and manner of the disposal.

3. If YOU claim the attorney-client privilege, or any other privilege or protection (including but not limited to work product, deliberative process, joint defense, or common interest protections) for any Document, YOU shall provide the following information with respect to each such DOCUMENT:
- (a) a. the type of privilege claimed;
 - (b) the type of DOCUMENT;
 - (c) the general subject matter of the DOCUMENT;
 - (d) the date of the DOCUMENT;
 - (e) such other information as is sufficient to identify the DOCUMENT for a subpoena duces tecum, including, where appropriate, the name and title of the author of the document, the name and title of any recipient, and identification of anyone providing legal counsel;
 - (f) the Request(s) to which the DOCUMENT is responsive; and
 - (g) any other information required to be furnished by Fed. R. Civ. P. 26(b)(5). Provide the information requested in this instruction in a searchable and sortable electronic format and with sufficient specificity to enable the undersigned counsel and the Court to assess the applicability of the claimed privilege or protection.
4. These requests shall be deemed continuing in nature so as to require production of all additional or different DOCUMENTS or information responsive to these requests, which YOU discover, receive, or generate between the time of the original production and trial.
5. All DOCUMENTS and/or other data which relate to the subject matter of this case or these requests must be preserved. Any destruction involving such DOCUMENTS must cease, even if it is YOUR normal or routine course of business to delete or destroy such DOCUMENTS or data and even if YOU believe such DOCUMENTS or data are privileged or otherwise need not be produced.
6. Unless otherwise stated, the relevant time period for all requests are for DOCUMENTS created or originating on or after January 1, 2012.

DOCUMENT REQUESTS

1. Any and all DOCUMENTS related to (1) Hyper Engine, (2) the “Fear” film, (3) the “Fear” Game, (4) “The House Next Door” film, and (5) the Bron Studios film “The Survivor”.
2. Any and all DOCUMENTS containing and/or evidencing communications between YOU and Roxanne Taylor related to (1) Hyper Engine, (2) the “Fear” film, (3) the “Fear” Game, (4) “The House Next Door” film, (5) the Bron Studios film “The Survivor”, (6) Darrick Angelone, and (7) AONE Creative, LLC (formerly known as AONE Entertainment, LLC), including but not limited to emails, text messages, and other correspondence.
3. Any and all DOCUMENTS containing and/or evidencing communications between YOU and Deon Taylor related to (1) Hyper Engine, (2) the “Fear” film, (3) the “Fear” Game, (4) “The House Next Door” film, (5) the Bron Studios film “The Survivor”, (6) Darrick Angelone, and (7) AONE Creative, LLC (formerly known as AONE Entertainment, LLC), including but not limited to emails, text messages, and other correspondence.
4. Any and all DOCUMENTS containing and/or evidencing communications between YOU and Darrick Angelone related to (1) Hyper Engine, (2) the “Fear” film, (3) the “Fear” Game, (4) “The House Next Door” film, and (5) the Bron Studios film “The Survivor”, including but not limited to emails, text messages, and other correspondence.
5. Any and all DOCUMENTS containing and/or evidencing communications between YOU and Hidden Empire Holdings, LLC (formerly known as Hidden Empire Film Group) related to (1) Hyper Engine, (2) the “Fear” film, (3) the “Fear” Game, (4) “The House Next Door” film, (5) the Bron Studios film “The Survivor”, (6) Darrick Angelone, and (7) AONE Creative, LLC (formerly known as AONE Entertainment, LLC), including but not limited to emails, text messages, and other correspondence.
6. Any and all DOCUMENTS containing and/or evidencing communications between YOU and AONE Creative, LLC (formerly known as AONE Entertainment, LLC) related to (1) Hyper Engine, (2) the “Fear” film, (3) the “Fear” Game, (4) “The House Next Door” film, and (5) the Bron Studios film “The Survivor”, including but not limited to emails, text messages, and other correspondence.

JEFF CLANAGAN

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Jeff Clanagan, 6320 Canoga Ave., Ste. 1470, Canoga Park, CA 91367

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

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on *(date)* _____.

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Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

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(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

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2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

1 instructions the DOCUMENT was destroyed or otherwise disposed
2 of, and the date and manner of the disposal.

3 3. If YOU claim the attorney-client privilege, or any other privilege or
4 protection (including but not limited to work product, deliberative process,
5 joint defense, or common interest protections) for any Document, YOU
6 shall provide the following information with respect to each such
DOCUMENT:

- 7 (a) a. the type of privilege claimed;
8 (b) the type of DOCUMENT;
9 (c) the general subject matter of the DOCUMENT;
10 (d) the date of the DOCUMENT;
11 (e) such other information as is sufficient to identify the DOCUMENT
12 for a subpoena duces tecum, including, where appropriate, the name
13 and title of the author of the document, the name and title of any
14 recipient, and identification of anyone providing legal counsel;
15 (f) the Request(s) to which the DOCUMENT is responsive; and
16 (g) any other information required to be furnished by Fed. R. Civ. P.
26(b)(5). Provide the information requested in this instruction in a
searchable and sortable electronic format and with sufficient
specificity to enable the undersigned counsel and the Court to assess
the applicability of the claimed privilege or protection.

17 4. These requests shall be deemed continuing in nature so as to require
18 production of all additional or different DOCUMENTS or information
19 responsive to these requests, which YOU discover, receive, or generate
between the time of the original production and trial.

20 5. All DOCUMENTS and/or other data which relate to the subject matter of
21 this case or these requests must be preserved. Any destruction involving
22 such DOCUMENTS must cease, even if it is YOUR normal or routine
23 course of business to delete or destroy such DOCUMENTS or data and
even if YOU believe such DOCUMENTS or data are privileged or
otherwise need not be produced.

24 6. Unless otherwise stated, the relevant time period for all requests are for
25 DOCUMENTS created or originating on or after January 1, 2012.

26 **DOCUMENT REQUESTS**
27
28

- 1 1. Any and all DOCUMENTS containing and/or evidencing contracts,
2 agreements, and business transactions between YOU and Hidden Empire
3 Holdings, LLC (formerly known as Hidden Empire Film Group), as they
4 relate to (1) the film “Meet the Blacks”, (2) the film “Traffik”, and (3)
marketing and/or promotion of Hidden Empire Film Group films.
- 5 2. Any and all DOCUMENTS containing and/or evidencing communications
6 between YOU and Roxanne Taylor regarding (1) the film “Meet the
7 Blacks”, the film “Traffik”, and (3) marketing and/or promotion of Hidden
8 Empire Film Group films.
- 9 3. Any and all DOCUMENTS containing and/or evidencing communications
10 between YOU and Deon Taylor regarding (1) the film “Meet the Blacks”,
11 (2) the film “Traffik”, and (3) marketing and/or promotion of Hidden
12 Empire Film Group films.
- 13 4. Any and all DOCUMENTS containing and/or evidencing communications
14 between YOU and Darrick Angelone regarding (1) the film “Meet the
15 Blacks”, (2) the film “Traffik”, and (3) marketing and/or promotion of
16 Hidden Empire Film Group films.
- 17 5. Any and all DOCUMENTS containing and/or evidencing communications
18 between YOU and AONE Creative, LLC (formerly known as AONE
19 Entertainment, LLC) regarding (1) the film “Meet the Blacks”, (2) the film
20 “Traffik”, and (3) marketing and/or promotion of Hidden Empire Film
21 Group films.
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JOHN FERRY

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: John Ferry, 1133 22nd Street, Apt 10, Santa Monica, CA 90403

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

1 instructions the DOCUMENT was destroyed or otherwise disposed
2 of, and the date and manner of the disposal.

3 3. If YOU claim the attorney-client privilege, or any other privilege or
4 protection (including but not limited to work product, deliberative process,
5 joint defense, or common interest protections) for any Document, YOU
6 shall provide the following information with respect to each such
DOCUMENT:

- 7 (a) a. the type of privilege claimed;
8 (b) the type of DOCUMENT;
9 (c) the general subject matter of the DOCUMENT;
10 (d) the date of the DOCUMENT;
11 (e) such other information as is sufficient to identify the DOCUMENT
12 for a subpoena duces tecum, including, where appropriate, the name
13 and title of the author of the document, the name and title of any
14 recipient, and identification of anyone providing legal counsel;
15 (f) the Request(s) to which the DOCUMENT is responsive; and
16 (g) any other information required to be furnished by Fed. R. Civ. P.
26(b)(5). Provide the information requested in this instruction in a
searchable and sortable electronic format and with sufficient
specificity to enable the undersigned counsel and the Court to assess
the applicability of the claimed privilege or protection.

17 4. These requests shall be deemed continuing in nature so as to require
18 production of all additional or different DOCUMENTS or information
19 responsive to these requests, which YOU discover, receive, or generate
between the time of the original production and trial.

20 5. All DOCUMENTS and/or other data which relate to the subject matter of
21 this case or these requests must be preserved. Any destruction involving
22 such DOCUMENTS must cease, even if it is YOUR normal or routine
23 course of business to delete or destroy such DOCUMENTS or data and
even if YOU believe such DOCUMENTS or data are privileged or
otherwise need not be produced.

24 6. Unless otherwise stated, the relevant time period for all requests are for
25 DOCUMENTS created or originating on or after January 1, 2012.

26 **DOCUMENT REQUESTS**
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- 1 1. Any and all DOCUMENTS related to (1) Hyper Engine, (2) marketing
2 and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear”
3 game (4) the “House Next Door” Marketing Campaign, (5) the CNBC
4 Vaccine Campaign, (6) Google email and/or web servers, and (7)
marketing and/or promotion of Hidden Empire Film Group films.
- 5 2. Any and all DOCUMENTS containing and/or evidencing communications
6 between YOU and Deon Taylor related to (1) Hyper Engine, (2) marketing
7 and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear”
8 game (4) the “House Next Door” Marketing Campaign, (5) the CNBC
9 Vaccine Campaign, (6) Google email and/or web servers, and (7)
10 marketing and/or promotion of Hidden Empire Film Group films,
including but not limited to emails, text messages, and other
correspondence.
- 11 3. Any and all DOCUMENTS containing and/or evidencing communications
12 between YOU and Roxanne Taylor related to (1) Hyper Engine, (2)
13 marketing and/or promotion of “Fear” film, (3) marketing and/or
14 promotion of “Fear” game (4) the “House Next Door” Marketing
15 Campaign, (5) the CNBC Vaccine Campaign, (6) Google email and/or web
16 servers, and (7) marketing and/or promotion of Hidden Empire Film Group
films, including but not limited to emails, text messages, and other
correspondence.
- 17 4. Any and all DOCUMENTS containing and/or evidencing communications
18 between YOU and Darrick Angelone related to (1) Hyper Engine, (2)
19 marketing and/or promotion of “Fear” film, (3) marketing and/or
20 promotion of “Fear” game (4) the “House Next Door” Marketing
21 Campaign, (5) the CNBC Vaccine Campaign, (6) Google email and/or web
22 servers, and (7) marketing and/or promotion of Hidden Empire Film Group
films, including but not limited to emails, text messages, and other
correspondence.
- 23 5. Any and all DOCUMENTS containing and/or evidencing communications
24 between YOU and Hidden Empire Holdings LLC (formerly known as
25 Hidden Empire Film Group) related to (1) Hyper Engine, (2) marketing
26 and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear”
27 game (4) the “House Next Door” Marketing Campaign, (5) the CNBC
28 Vaccine Campaign, (6) Google email and/or web servers, and (7)
marketing and/or promotion of Hidden Empire Film Group films,
including but not limited to emails, text messages, and other
correspondence.

1
2 6. Any and all DOCUMENTS containing and/or evidencing communications
3 between YOU and Hyper Engine, LLC related to (1) Hyper Engine, (2)
4 marketing and/or promotion of “Fear” film, (3) marketing and/or
5 promotion of “Fear” game (4) the “House Next Door” Marketing
6 Campaign, (5) the CNBC Vaccine Campaign, (6) Google email and/or web
7 servers, and (7) marketing and/or promotion of Hidden Empire Film Group
8 films, including but not limited to emails, text messages, and other
9 correspondence.

10 7. Any and all DOCUMENTS containing and/or evidencing communications
11 between YOU and AONE Creative, LLC (formerly known as AONE
12 Entertainment, LLC) related to (1) Hyper Engine, (2) marketing and/or
13 promotion of “Fear” film, (3) marketing and/or promotion of “Fear” game
14 (4) the “House Next Door” Marketing Campaign, (5) the CNBC Vaccine
15 Campaign, (6) Google email and/or web servers, and (7) marketing and/or
16 promotion of Hidden Empire Film Group films, including but not limited
17 to emails, text messages, and other correspondence.
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JOSEPH SIKORA

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Joseph Sikora, 9665 Wilshire Blvd, 5th Floor, Beverly Hills, CA 90212

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
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(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

1 instructions the DOCUMENT was destroyed or otherwise disposed
2 of, and the date and manner of the disposal.

3 3. If YOU claim the attorney-client privilege, or any other privilege or
4 protection (including but not limited to work product, deliberative process,
5 joint defense, or common interest protections) for any Document, YOU
6 shall provide the following information with respect to each such
DOCUMENT:

- 7 (a) a. the type of privilege claimed;
- 8 (b) the type of DOCUMENT;
- 9 (c) the general subject matter of the DOCUMENT;
- 10 (d) the date of the DOCUMENT;
- 11 (e) such other information as is sufficient to identify the DOCUMENT
12 for a subpoena duces tecum, including, where appropriate, the name
13 and title of the author of the document, the name and title of any
14 recipient, and identification of anyone providing legal counsel;
- 15 (f) the Request(s) to which the DOCUMENT is responsive; and
- 16 (g) any other information required to be furnished by Fed. R. Civ. P.
17 26(b)(5). Provide the information requested in this instruction in a
18 searchable and sortable electronic format and with sufficient
19 specificity to enable the undersigned counsel and the Court to assess
20 the applicability of the claimed privilege or protection.

21 4. These requests shall be deemed continuing in nature so as to require
22 production of all additional or different DOCUMENTS or information
23 responsive to these requests, which YOU discover, receive, or generate
24 between the time of the original production and trial.

25 5. All DOCUMENTS and/or other data which relate to the subject matter of
26 this case or these requests must be preserved. Any destruction involving
27 such DOCUMENTS must cease, even if it is YOUR normal or routine
28 course of business to delete or destroy such DOCUMENTS or data and
even if YOU believe such DOCUMENTS or data are privileged or
otherwise need not be produced.

6. Unless otherwise stated, the relevant time period for all requests are for
DOCUMENTS created or originating on or after January 1, 2012.

DOCUMENT REQUESTS

- 1 1. Any and all DOCUMENTS containing and/or evidencing communications
2 between YOU and Deon Taylor related to (1) marketing and/or promotion
3 of “Fear” film, and (2) marketing and/or promotion of “Fear” game,
4 including but not limited to emails, text messages, and other
correspondence.
- 5 2. Any and all DOCUMENTS containing and/or evidencing communications
6 between YOU and Roxanne Taylor related to (1) marketing and/or
7 promotion of “Fear” film, and (2) marketing and/or promotion of “Fear”
8 game, including but not limited to emails, text messages, and other
correspondence.
- 9 3. Any and all DOCUMENTS containing and/or evidencing communications
10 between YOU and Quincy Newell related to (1) marketing and/or
11 promotion of “Fear” film, and (2) marketing and/or promotion of “Fear”
12 game, including but not limited to emails, text messages, and other
correspondence.
- 13 4. Any and all DOCUMENTS containing and/or evidencing communications
14 between YOU and Hidden Empire Holdings LLC (formerly known as
15 Hidden Empire Film Group) related to (1) marketing and/or promotion of
16 “Fear” film, and (2) marketing and/or promotion of “Fear” game, including
but not limited to emails, text messages, and other correspondence.
- 17 5. Any and all DOCUMENTS related to Joseph Sikora’s involvement with
18 the “Fear” film, including but not limited to terms, term sheets, contracts,
19 and/or agreements.
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JUSTIN GREYSTONE

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Justin Greystone, 10100 Santa Monica Blvd, Suite 2300, Los Angeles CA 90067

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

instructions the DOCUMENT was destroyed or otherwise disposed of, and the date and manner of the disposal.

3. If YOU claim the attorney-client privilege, or any other privilege or protection (including but not limited to work product, deliberative process, joint defense, or common interest protections) for any Document, YOU shall provide the following information with respect to each such DOCUMENT:
- (a) a. the type of privilege claimed;
 - (b) the type of DOCUMENT;
 - (c) the general subject matter of the DOCUMENT;
 - (d) the date of the DOCUMENT;
 - (e) such other information as is sufficient to identify the DOCUMENT for a subpoena duces tecum, including, where appropriate, the name and title of the author of the document, the name and title of any recipient, and identification of anyone providing legal counsel;
 - (f) the Request(s) to which the DOCUMENT is responsive; and
 - (g) any other information required to be furnished by Fed. R. Civ. P. 26(b)(5). Provide the information requested in this instruction in a searchable and sortable electronic format and with sufficient specificity to enable the undersigned counsel and the Court to assess the applicability of the claimed privilege or protection.
4. These requests shall be deemed continuing in nature so as to require production of all additional or different DOCUMENTS or information responsive to these requests, which YOU discover, receive, or generate between the time of the original production and trial.
5. All DOCUMENTS and/or other data which relate to the subject matter of this case or these requests must be preserved. Any destruction involving such DOCUMENTS must cease, even if it is YOUR normal or routine course of business to delete or destroy such DOCUMENTS or data and even if YOU believe such DOCUMENTS or data are privileged or otherwise need not be produced.
6. Unless otherwise stated, the relevant time period for all requests are for DOCUMENTS created or originating on or after January 1, 2012.

DOCUMENT REQUESTS

- 1 1. Any and all DOCUMENTS containing and/or evidencing communications
2 between YOU and Deon Taylor related to Hyper Engine, LLC, including
3 but not limited to emails, text messages, and other correspondence.
- 4 2. Any and all DOCUMENTS containing and/or evidencing communications
5 between YOU and Roxanne Taylor related to Hyper Engine, LLC,
6 including but not limited to emails, text messages, and other
7 correspondence.
- 8 3. Any and all DOCUMENTS containing and/or evidencing communications
9 between YOU and Quincy Newell related to Hyper Engine, LLC,
10 including but not limited to emails, text messages, and other
11 correspondence.
- 12 4. Any and all DOCUMENTS containing and/or evidencing communications
13 between YOU and Hidden Empire Holdings LLC (formerly known as
14 Hidden Empire Film Group) related to Hyper Engine, LLC, including but
15 not limited to emails, text messages, and other correspondence.
- 16 5. Any and all DOCUMENTS related to and/or created for Hyper Engine,
17 LLC.
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KAZUKO GOLDEN

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Kazuko Golden, 1669 12th St., Santa Monica, CA 90404

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

1 instructions the DOCUMENT was destroyed or otherwise disposed
2 of, and the date and manner of the disposal.

3 3. If YOU claim the attorney-client privilege, or any other privilege or
4 protection (including but not limited to work product, deliberative process,
5 joint defense, or common interest protections) for any Document, YOU
6 shall provide the following information with respect to each such
DOCUMENT:

- 7 (a) a. the type of privilege claimed;
8 (b) the type of DOCUMENT;
9 (c) the general subject matter of the DOCUMENT;
10 (d) the date of the DOCUMENT;
11 (e) such other information as is sufficient to identify the DOCUMENT
12 for a subpoena duces tecum, including, where appropriate, the name
13 and title of the author of the document, the name and title of any
14 recipient, and identification of anyone providing legal counsel;
15 (f) the Request(s) to which the DOCUMENT is responsive; and
16 (g) any other information required to be furnished by Fed. R. Civ. P.
26(b)(5). Provide the information requested in this instruction in a
searchable and sortable electronic format and with sufficient
specificity to enable the undersigned counsel and the Court to assess
the applicability of the claimed privilege or protection.

17 4. These requests shall be deemed continuing in nature so as to require
18 production of all additional or different DOCUMENTS or information
19 responsive to these requests, which YOU discover, receive, or generate
between the time of the original production and trial.

20 5. All DOCUMENTS and/or other data which relate to the subject matter of
21 this case or these requests must be preserved. Any destruction involving
22 such DOCUMENTS must cease, even if it is YOUR normal or routine
23 course of business to delete or destroy such DOCUMENTS or data and
even if YOU believe such DOCUMENTS or data are privileged or
otherwise need not be produced.

24 6. Unless otherwise stated, the relevant time period for all requests are for
25 DOCUMENTS created or originating on or after January 1, 2012.

26 **DOCUMENT REQUESTS**
27
28

- 1
2 1. Any and all DOCUMENTS related to (1) Hyper Engine, (2) marketing
3 and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear”
4 game (4) the “House Next Door” Marketing Campaign, (5) the CNBC
5 Vaccine Campaign, (6) Google email and/or web servers, and (7)
6 marketing and/or promotion of Hidden Empire Film Group films.
- 7
8 2. Any and all DOCUMENTS containing and/or evidencing communications
9 between YOU and Deon Taylor related to (1) Hyper Engine, (2) marketing
10 and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear”
11 game (4) the “House Next Door” Marketing Campaign, (5) the CNBC
12 Vaccine Campaign, (6) Google email and/or web servers, (7) Darrick
13 Angelone, (8) AONE Creative LLC, and (9) marketing and/or promotion
14 of Hidden Empire Film Group films, including but not limited to emails,
15 text messages, and other correspondence.
- 16
17 3. Any and all DOCUMENTS containing and/or evidencing communications
18 between YOU and Roxanne Taylor related to (1) Hyper Engine, (2)
19 marketing and/or promotion of “Fear” film, (3) marketing and/or
20 promotion of “Fear” game (4) the “House Next Door” Marketing
21 Campaign, (5) the CNBC Vaccine Campaign, (6) Google email and/or web
22 servers, (7) Darrick Angelone, (8) AONE Creative LLC, and (9) marketing
23 and/or promotion of Hidden Empire Film Group films, including but not
24 limited to emails, text messages, and other correspondence.
- 25
26 4. Any and all DOCUMENTS containing and/or evidencing communications
27 between YOU and Darrick Angelone related to (1) Hyper Engine, (2)
28 marketing and/or promotion of “Fear” film, (3) marketing and/or
promotion of “Fear” game (4) the “House Next Door” Marketing
Campaign, (5) the CNBC Vaccine Campaign, (6) Google email and/or web
servers, (7) Darrick Angelone, (8) AONE Creative LLC, and (9) marketing
and/or promotion of Hidden Empire Film Group films, including but not
limited to emails, text messages, and other correspondence.
5. Any and all DOCUMENTS containing and/or evidencing communications
between YOU and Hidden Empire Holdings LLC (formerly known as
Hidden Empire Film Group) related to (1) Hyper Engine, (2) marketing
and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear”
game (4) the “House Next Door” Marketing Campaign, (5) the CNBC
Vaccine Campaign, (6) Google email and/or web servers, (7) Darrick
Angelone, (8) AONE Creative LLC, and (9) marketing and/or promotion

1 of Hidden Empire Film Group films, including but not limited to emails,
2 text messages, and other correspondence.

3 6. Any and all DOCUMENTS containing and/or evidencing communications
4 between YOU and Hyper Engine, LLC related to (1) Hyper Engine, (2)
5 marketing and/or promotion of “Fear” film, (3) marketing and/or
6 promotion of “Fear” game (4) the “House Next Door” Marketing
7 Campaign, (5) the CNBC Vaccine Campaign, (6) Google email and/or web
8 servers, (7) Darrick Angelone, (8) AONE Creative LLC, and (9) marketing
and/or promotion of Hidden Empire Film Group films, including but not
limited to emails, text messages, and other correspondence.

9 7. Any and all DOCUMENTS containing and/or evidencing communications
10 between YOU and AONE Creative, LLC (formerly known as AONE
11 Entertainment, LLC) related to (1) Hyper Engine, (2) marketing and/or
12 promotion of “Fear” film, (3) marketing and/or promotion of “Fear” game
13 (4) the “House Next Door” Marketing Campaign, (5) the CNBC Vaccine
14 Campaign, (6) Google email and/or web servers, (7) Darrick Angelone, (8)
AONE Creative LLC, and (9) marketing and/or promotion of Hidden
Empire Film Group films, including but not limited to emails, text
messages, and other correspondence.

KRISTI KILDAY

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Kristi Kilday, 1801 Century Park East, 24th Floor, Los Angeles, California 90067

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

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(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
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(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
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(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
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kind on the front or back thereof.

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12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
18 YOUR behalf, or who have otherwise obtained possession, custody or
19 control, or who, upon YOUR request, would surrender possession, custody
20 or control to YOU.
- 21 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
22 custody or control, produce a description of each such DOCUMENT. The
23 description shall include the following:
 - 24 (a) the name of each author, sender, creator, and initiator of such
25 DOCUMENT;
 - 26 (b) the name of each recipient, addressee, or party for whom such
27 DOCUMENT was intended;
 - 28 (c) the date the DOCUMENT was created;
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and
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- 7 (a) a. the type of privilege claimed;
8 (b) the type of DOCUMENT;
9 (c) the general subject matter of the DOCUMENT;
10 (d) the date of the DOCUMENT;
11 (e) such other information as is sufficient to identify the DOCUMENT
12 for a subpoena duces tecum, including, where appropriate, the name
13 and title of the author of the document, the name and title of any
14 recipient, and identification of anyone providing legal counsel;
15 (f) the Request(s) to which the DOCUMENT is responsive; and
16 (g) any other information required to be furnished by Fed. R. Civ. P.
26(b)(5). Provide the information requested in this instruction in a
searchable and sortable electronic format and with sufficient
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20 5. All DOCUMENTS and/or other data which relate to the subject matter of
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22 such DOCUMENTS must cease, even if it is YOUR normal or routine
23 course of business to delete or destroy such DOCUMENTS or data and
even if YOU believe such DOCUMENTS or data are privileged or
otherwise need not be produced.

24 6. Unless otherwise stated, the relevant time period for all requests are for
25 DOCUMENTS created or originating on or after January 1, 2012.

26 **DOCUMENT REQUESTS**
27
28

- 1 1. All DOCUMENTS created for, related to, and/or evidencing the Untitled
2 Scripted Series about Percy Miller (AKA “Master P”).
- 3 2. Any and all DOCUMENTS containing and/or evidencing communications
4 between YOU and Roxanne Taylor related to the Untitled Scripted Series
5 about Percy Miller (AKA “Master P”), including but not limited to emails,
6 text messages, and other correspondence.
- 7 3. Any and all DOCUMENTS containing and/or evidencing communications
8 between YOU and Deon Taylor related to the Untitled Scripted Series
9 about Percy Miller (AKA “Master P”), including but not limited to emails,
10 text messages, and other correspondence.
- 11 4. Any and all DOCUMENTS containing and/or evidencing communications
12 between YOU and Hidden Empire Holdings, LLC (formerly known as
13 Hidden Empire Film Group) related to the Untitled Scripted Series about
14 Percy Miller (AKA “Master P”), including but not limited to emails, text
15 messages, and other correspondence.
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LAMYA MALHOTRA

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Lamya Malhotra, 3190 CA-128, Caligosta, CA 94515

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

1 instructions the DOCUMENT was destroyed or otherwise disposed
2 of, and the date and manner of the disposal.

3 3. If YOU claim the attorney-client privilege, or any other privilege or
4 protection (including but not limited to work product, deliberative process,
5 joint defense, or common interest protections) for any Document, YOU
6 shall provide the following information with respect to each such
DOCUMENT:

- 7 (a) a. the type of privilege claimed;
8 (b) the type of DOCUMENT;
9 (c) the general subject matter of the DOCUMENT;
10 (d) the date of the DOCUMENT;
11 (e) such other information as is sufficient to identify the DOCUMENT
12 for a subpoena duces tecum, including, where appropriate, the name
13 and title of the author of the document, the name and title of any
14 recipient, and identification of anyone providing legal counsel;
15 (f) the Request(s) to which the DOCUMENT is responsive; and
16 (g) any other information required to be furnished by Fed. R. Civ. P.
26(b)(5). Provide the information requested in this instruction in a
searchable and sortable electronic format and with sufficient
specificity to enable the undersigned counsel and the Court to assess
the applicability of the claimed privilege or protection.

17 4. These requests shall be deemed continuing in nature so as to require
18 production of all additional or different DOCUMENTS or information
19 responsive to these requests, which YOU discover, receive, or generate
between the time of the original production and trial.

20 5. All DOCUMENTS and/or other data which relate to the subject matter of
21 this case or these requests must be preserved. Any destruction involving
22 such DOCUMENTS must cease, even if it is YOUR normal or routine
23 course of business to delete or destroy such DOCUMENTS or data and
even if YOU believe such DOCUMENTS or data are privileged or
otherwise need not be produced.

24 6. Unless otherwise stated, the relevant time period for all requests are for
25 DOCUMENTS created or originating on or after January 1, 2012.

26 **DOCUMENT REQUESTS**
27
28

- 1 1. Any and all DOCUMENTS containing and/or evidencing communications
2 between YOU and Roxanne Taylor related to (1) Hyper Engine, and (2)
3 marketing and/or promotion services provided to Work Vineyard,
4 including but not limited to emails, text messages, and other
correspondence.
- 5 2. Any and all DOCUMENTS containing and/or evidencing communications
6 between YOU and Deon Taylor related to (1) Hyper Engine, and (2)
7 marketing and/or promotion services provided to Work Vineyard,
8 including but not limited to emails, text messages, and other
correspondence.
- 9 3. Any and all DOCUMENTS containing and/or evidencing communications
10 between YOU and Hidden Empire Holdings, LLC (formerly known as
11 Hidden Empire Film Group) related to (1) Hyper Engine, and (2)
12 marketing and/or promotion services provided to Work Vineyard,
13 including but not limited to emails, text messages, and other
correspondence.
- 14 4. Any and all DOCUMENTS containing and/or evidencing communications
15 between YOU and Darrick Angelone related to (1) Hyper Engine, and (2)
16 marketing and/or promotion services provided to Work Vineyard,
17 including but not limited to emails, text messages, and other
correspondence.
- 18 5. Any and all DOCUMENTS containing and/or evidencing communications
19 between YOU and AONE Creative, LLC (formerly known as AONE
20 Entertainment, LLC) related to (1) Hyper Engine, and (2) marketing and/or
21 promotion services provided to Work Vineyard, including but not limited
22 to emails, text messages, and other correspondence.
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LIONSGATE ENTERTAINMENT

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Lionsgate Entertainment, Inc., c/o Custodian of Records, 2700 Colorado Ave. Ste 200., Santa Monica, CA 90404

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
18 YOUR behalf, or who have otherwise obtained possession, custody or
19 control, or who, upon YOUR request, would surrender possession, custody
20 or control to YOU.
- 21 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
22 custody or control, produce a description of each such DOCUMENT. The
23 description shall include the following:
 - 24 (a) the name of each author, sender, creator, and initiator of such
25 DOCUMENT;
 - 26 (b) the name of each recipient, addressee, or party for whom such
27 DOCUMENT was intended;
 - 28 (c) the date the DOCUMENT was created;
 - (d) the date(s) the DOCUMENT was in use;
 - (e) a detailed description of the content of the DOCUMENT;
 - (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - (g) the DOCUMENT's current location.
 - (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

instructions the DOCUMENT was destroyed or otherwise disposed of, and the date and manner of the disposal.

3. If YOU claim the attorney-client privilege, or any other privilege or protection (including but not limited to work product, deliberative process, joint defense, or common interest protections) for any Document, YOU shall provide the following information with respect to each such DOCUMENT:
 - (a) a. the type of privilege claimed;
 - (b) the type of DOCUMENT;
 - (c) the general subject matter of the DOCUMENT;
 - (d) the date of the DOCUMENT;
 - (e) such other information as is sufficient to identify the DOCUMENT for a subpoena duces tecum, including, where appropriate, the name and title of the author of the document, the name and title of any recipient, and identification of anyone providing legal counsel;
 - (f) the Request(s) to which the DOCUMENT is responsive; and
 - (g) any other information required to be furnished by Fed. R. Civ. P. 26(b)(5). Provide the information requested in this instruction in a searchable and sortable electronic format and with sufficient specificity to enable the undersigned counsel and the Court to assess the applicability of the claimed privilege or protection.
4. These requests shall be deemed continuing in nature so as to require production of all additional or different DOCUMENTS or information responsive to these requests, which YOU discover, receive, or generate between the time of the original production and trial.
5. All DOCUMENTS and/or other data which relate to the subject matter of this case or these requests must be preserved. Any destruction involving such DOCUMENTS must cease, even if it is YOUR normal or routine course of business to delete or destroy such DOCUMENTS or data and even if YOU believe such DOCUMENTS or data are privileged or otherwise need not be produced.
6. Unless otherwise stated, the relevant time period for all requests are for DOCUMENTS created or originating on or after January 1, 2012.

DOCUMENT REQUESTS

- 1 1. All DOCUMENTS evidencing, containing, and/or related to contracts,
2 agreements, and/or business transactions between YOU and Hyper Engine,
3 LLC (“Hyper Engine”) as they relate to the films known as “Traffik”,
4 “Fatale”, “The House Next Door”, and “Meet the Blacks”.
- 5 2. Any and all DOCUMENTS containing and/or evidencing communications
6 between YOU and Roxanne Taylor related to (1) Hyper Engine, and (2)
7 marketing and/or promotion of Hidden Empire Film Group films,
8 including but not limited to emails, text messages, and other
9 correspondence.
- 10 3. Any and all DOCUMENTS containing and/or evidencing communications
11 between YOU and Deon Taylor related to (1) Hyper Engine, and (2)
12 marketing and/or promotion of Hidden Empire Film Group films,
13 including but not limited to emails, text messages, and other
14 correspondence.
- 15 4. Any and all DOCUMENTS containing and/or evidencing communications
16 between YOU and Darrick Angelone related to (1) Hyper Engine, and (2)
17 marketing and/or promotion of Hidden Empire Film Group films,
18 including but not limited to emails, text messages, and other
19 correspondence.
- 20 5. Any and all DOCUMENTS containing and/or evidencing communications
21 between YOU and Hidden Empire Holdings, LLC (formerly known as
22 Hidden Empire Film Group) related to (1) Hyper Engine, and (2)
23 marketing and/or promotion of Hidden Empire Film Group films,
24 including but not limited to emails, text messages, and other
25 correspondence.
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27
28

MAYWEATHER PRODUCTIONS

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Mayweather Promotions, c/o Custodian of Records, 4616 W. Sahara Ave., #290, Las Vegas, NV 89102

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 12:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
 - (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
 - (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
 - (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

instructions the DOCUMENT was destroyed or otherwise disposed of, and the date and manner of the disposal.

3. If YOU claim the attorney-client privilege, or any other privilege or protection (including but not limited to work product, deliberative process, joint defense, or common interest protections) for any Document, YOU shall provide the following information with respect to each such DOCUMENT:
- (a) a. the type of privilege claimed;
 - (b) the type of DOCUMENT;
 - (c) the general subject matter of the DOCUMENT;
 - (d) the date of the DOCUMENT;
 - (e) such other information as is sufficient to identify the DOCUMENT for a subpoena duces tecum, including, where appropriate, the name and title of the author of the document, the name and title of any recipient, and identification of anyone providing legal counsel;
 - (f) the Request(s) to which the DOCUMENT is responsive; and
 - (g) any other information required to be furnished by Fed. R. Civ. P. 26(b)(5). Provide the information requested in this instruction in a searchable and sortable electronic format and with sufficient specificity to enable the undersigned counsel and the Court to assess the applicability of the claimed privilege or protection.
4. These requests shall be deemed continuing in nature so as to require production of all additional or different DOCUMENTS or information responsive to these requests, which YOU discover, receive, or generate between the time of the original production and trial.
5. All DOCUMENTS and/or other data which relate to the subject matter of this case or these requests must be preserved. Any destruction involving such DOCUMENTS must cease, even if it is YOUR normal or routine course of business to delete or destroy such DOCUMENTS or data and even if YOU believe such DOCUMENTS or data are privileged or otherwise need not be produced.
6. Unless otherwise stated, the relevant time period for all requests are for DOCUMENTS created or originating on or after January 1, 2012.

DOCUMENT REQUESTS

- 1
2 1. Any and all DOCUMENTS containing and/or evidencing communications
3 between YOU and Roxanne Taylor related to (1) the “GOAT” Docuseries
4 about professional boxer Floyd Mayweather, (2) TV and/or film projects,
5 and (3) marketing and/or promotion of Hidden Empire Film Group films,
6 including but not limited to emails, text messages, and other
7 correspondence.
- 8 2. Any and all DOCUMENTS containing and/or evidencing communications
9 between YOU and Deon Taylor (1) the “GOAT” Docuseries about
10 professional boxer Floyd Mayweather, (2) TV and/or film projects, and (3)
11 marketing and/or promotion of Hidden Empire Film Group films,
12 including but not limited to emails, text messages, and other
13 correspondence.
- 14 3. Any and all DOCUMENTS containing and/or evidencing communications
15 between YOU and Hidden Empire Holdings, LLC (formerly known as
16 Hidden Empire Film Group) (1) the “GOAT” Docuseries about
17 professional boxer Floyd Mayweather, (2) TV and/or film projects, and (3)
18 marketing and/or promotion of Hidden Empire Film Group films,
19 including but not limited to emails, text messages, and other
20 correspondence.
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McGEE MEDIA

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: McGee Media, LLC., c/o Custodian of Records, 9 East 37th Street, 9th Floor, New York, NY 10016

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
10 used herein, all drafts or versions, and all non-identical copies of any such
11 DOCUMENT, including but not limited to those DOCUMENTS that
12 contain markings, symbols, interlineations, comments, or notations of any
13 kind on the front or back thereof.

14 **GENERAL INSTRUCTIONS**

- 15 1. In responding to these Requests, YOU are to furnish All available
16 information, including information in the possession, custody, or control of
17 YOUR agents and all persons acting on YOUR behalf. This includes
18 DOCUMENTS presently in the possession, custody or control of YOUR
19 attorney(s) or their investigators or any third party or parties to whom YOU
20 have surrendered possession, custody, or control, or who are acting on
21 YOUR behalf, or who have otherwise obtained possession, custody or
22 control, or who, upon YOUR request, would surrender possession, custody
23 or control to YOU.
- 24 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
25 custody or control, produce a description of each such DOCUMENT. The
26 description shall include the following:
 - 27 (a) the name of each author, sender, creator, and initiator of such
28 DOCUMENT;
 - (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - (c) the date the DOCUMENT was created;
 - (d) the date(s) the DOCUMENT was in use;
 - (e) a detailed description of the content of the DOCUMENT;
 - (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - (g) the DOCUMENT's current location.
 - (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

1 instructions the DOCUMENT was destroyed or otherwise disposed
2 of, and the date and manner of the disposal.

- 3 3. If YOU claim the attorney-client privilege, or any other privilege or
4 protection (including but not limited to work product, deliberative process,
5 joint defense, or common interest protections) for any Document, YOU
6 shall provide the following information with respect to each such
DOCUMENT:

- 7 (a) a. the type of privilege claimed;
8 (b) the type of DOCUMENT;
9 (c) the general subject matter of the DOCUMENT;
10 (d) the date of the DOCUMENT;
11 (e) such other information as is sufficient to identify the DOCUMENT
12 for a subpoena duces tecum, including, where appropriate, the name
13 and title of the author of the document, the name and title of any
14 recipient, and identification of anyone providing legal counsel;
15 (f) the Request(s) to which the DOCUMENT is responsive; and
16 (g) any other information required to be furnished by Fed. R. Civ. P.
26(b)(5). Provide the information requested in this instruction in a
searchable and sortable electronic format and with sufficient
specificity to enable the undersigned counsel and the Court to assess
the applicability of the claimed privilege or protection.

- 17 4. These requests shall be deemed continuing in nature so as to require
18 production of all additional or different DOCUMENTS or information
19 responsive to these requests, which YOU discover, receive, or generate
20 between the time of the original production and trial.
- 21 5. All DOCUMENTS and/or other data which relate to the subject matter of
22 this case or these requests must be preserved. Any destruction involving
23 such DOCUMENTS must cease, even if it is YOUR normal or routine
24 course of business to delete or destroy such DOCUMENTS or data and
25 even if YOU believe such DOCUMENTS or data are privileged or
26 otherwise need not be produced.
- 27 6. Unless otherwise stated, the relevant time period for all requests are for
28 DOCUMENTS created or originating on or after January 1, 2012.

DOCUMENT REQUESTS

- 1 1. All DOCUMENTS establishing ownership and/or containing ownership
2 information regarding the series “Black History in Two Minutes”.
- 3 2. Any and all DOCUMENTS containing and/or evidencing communications
4 between YOU and Roxanne Taylor related to (1) Hyper Engine, LLC and
5 (2) marketing and/or promotion of Hidden Empire Film Group films,
6 including but not limited to emails, text messages, and other
7 correspondence.
- 8 3. Any and all DOCUMENTS containing and/or evidencing communications
9 between YOU and Deon Taylor related to (1) Hyper Engine, LLC and (2)
10 marketing and/or promotion of Hidden Empire Film Group films,
11 including but not limited to emails, text messages, and other
12 correspondence.
- 13 4. Any and all DOCUMENTS containing and/or evidencing communications
14 between YOU and Roxanne Taylor related to the series “Black History in
15 Two Minutes”, including but not limited to emails, text messages, and
16 other correspondence.
- 17 5. Any and all DOCUMENTS containing and/or evidencing communications
18 between YOU and Deon Taylor related to the series “Black History in Two
19 Minutes”, including but not limited to emails, text messages, and other
20 correspondence.
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MELISSA BREAU

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Melissa Breau, 10100 Santa Monica Blvd, Suite 2300, Los Angeles CA 90067

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

1 instructions the DOCUMENT was destroyed or otherwise disposed
2 of, and the date and manner of the disposal.

3 3. If YOU claim the attorney-client privilege, or any other privilege or
4 protection (including but not limited to work product, deliberative process,
5 joint defense, or common interest protections) for any Document, YOU
6 shall provide the following information with respect to each such
DOCUMENT:

- 7 (a) a. the type of privilege claimed;
8 (b) the type of DOCUMENT;
9 (c) the general subject matter of the DOCUMENT;
10 (d) the date of the DOCUMENT;
11 (e) such other information as is sufficient to identify the DOCUMENT
12 for a subpoena duces tecum, including, where appropriate, the name
13 and title of the author of the document, the name and title of any
14 recipient, and identification of anyone providing legal counsel;
15 (f) the Request(s) to which the DOCUMENT is responsive; and
16 (g) any other information required to be furnished by Fed. R. Civ. P.
26(b)(5). Provide the information requested in this instruction in a
searchable and sortable electronic format and with sufficient
specificity to enable the undersigned counsel and the Court to assess
the applicability of the claimed privilege or protection.

17 4. These requests shall be deemed continuing in nature so as to require
18 production of all additional or different DOCUMENTS or information
19 responsive to these requests, which YOU discover, receive, or generate
between the time of the original production and trial.

20 5. All DOCUMENTS and/or other data which relate to the subject matter of
21 this case or these requests must be preserved. Any destruction involving
22 such DOCUMENTS must cease, even if it is YOUR normal or routine
23 course of business to delete or destroy such DOCUMENTS or data and
even if YOU believe such DOCUMENTS or data are privileged or
otherwise need not be produced.

24 6. Unless otherwise stated, the relevant time period for all requests are for
25 DOCUMENTS created or originating on or after January 1, 2012.

26 **DOCUMENT REQUESTS**
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28

- 1 1. Any and all DOCUMENTS containing and/or evidencing communications
2 between YOU and Deon Taylor related to Hyper Engine, LLC, including
3 but not limited to emails, text messages, and other correspondence.
- 4 2. Any and all DOCUMENTS containing and/or evidencing communications
5 between YOU and Roxanne Taylor related to Hyper Engine, LLC,
6 including but not limited to emails, text messages, and other
7 correspondence.
- 8 3. Any and all DOCUMENTS containing and/or evidencing communications
9 between YOU and Quincy Newell related to Hyper Engine, LLC,
10 including but not limited to emails, text messages, and other
11 correspondence.
- 12 4. Any and all DOCUMENTS containing and/or evidencing communications
13 between YOU and Hidden Empire Holdings LLC (formerly known as
14 Hidden Empire Film Group) related to Hyper Engine, LLC, including but
15 not limited to emails, text messages, and other correspondence.
- 16 5. Any and all DOCUMENTS related to and/or created for Hyper Engine,
17 LLC.
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META PLATFORMS, INC.

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Meta Platforms, Inc c/o Instagram, 1601 Willow Road, Menlo Park, CA 94025

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

- 11
12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

instructions the DOCUMENT was destroyed or otherwise disposed of, and the date and manner of the disposal.

3. If YOU claim the attorney-client privilege, or any other privilege or protection (including but not limited to work product, deliberative process, joint defense, or common interest protections) for any Document, YOU shall provide the following information with respect to each such DOCUMENT:
- (a) a. the type of privilege claimed;
 - (b) the type of DOCUMENT;
 - (c) the general subject matter of the DOCUMENT;
 - (d) the date of the DOCUMENT;
 - (e) such other information as is sufficient to identify the DOCUMENT for a subpoena duces tecum, including, where appropriate, the name and title of the author of the document, the name and title of any recipient, and identification of anyone providing legal counsel;
 - (f) the Request(s) to which the DOCUMENT is responsive; and
 - (g) any other information required to be furnished by Fed. R. Civ. P. 26(b)(5). Provide the information requested in this instruction in a searchable and sortable electronic format and with sufficient specificity to enable the undersigned counsel and the Court to assess the applicability of the claimed privilege or protection.
4. These requests shall be deemed continuing in nature so as to require production of all additional or different DOCUMENTS or information responsive to these requests, which YOU discover, receive, or generate between the time of the original production and trial.
5. All DOCUMENTS and/or other data which relate to the subject matter of this case or these requests must be preserved. Any destruction involving such DOCUMENTS must cease, even if it is YOUR normal or routine course of business to delete or destroy such DOCUMENTS or data and even if YOU believe such DOCUMENTS or data are privileged or otherwise need not be produced.
6. Unless otherwise stated, the relevant time period for all requests are for DOCUMENTS created or originating on or after January 1, 2012.

DOCUMENT REQUESTS

- 1 1. For each of the Instagram accounts set forth below, all DOCUMENTS
2 evidencing, reflecting, and/or stating the (a) account owner full name; (b)
3 account owner telephone number; (c) account owner email; (d) account
4 billing information; (e) account connection logs to include IP address
5 logins; and (f) records of account changes:
 - 6 a. @fatalemovie; and
 - 7 b. @intrudermovie
- 8 2. For each of the Instagram accounts set forth below, all DOCUMENTS
9 evidencing, reflecting, and/or stating the (1) historical ip logs and (2)
10 historical activity logs:
 - 11 a. @hiddenempirefilmgroup;
 - 12 b. @bewokevote;
 - 13 c. @blackhistoryintwominutes; and
 - 14 d. @fear.movie

MICHAEL CLAPS

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Michael Claps, 1133 22nd St., Apt. 10, Santa Monica, CA 90403

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste
E-106, Costa Mesa, CA 92626;
depositionclerk@ddslegal.com

Date and Time:

04/03/2023 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
used herein, all drafts or versions, and all non-identical copies of any such
DOCUMENT, including but not limited to those DOCUMENTS that
contain markings, symbols, interlineations, comments, or notations of any
kind on the front or back thereof.

10 GENERAL INSTRUCTIONS

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12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

instructions the DOCUMENT was destroyed or otherwise disposed of, and the date and manner of the disposal.

3. If YOU claim the attorney-client privilege, or any other privilege or protection (including but not limited to work product, deliberative process, joint defense, or common interest protections) for any Document, YOU shall provide the following information with respect to each such DOCUMENT:
- (a) the type of privilege claimed;
 - (b) the type of DOCUMENT;
 - (c) the general subject matter of the DOCUMENT;
 - (d) the date of the DOCUMENT;
 - (e) such other information as is sufficient to identify the DOCUMENT for a subpoena duces tecum, including, where appropriate, the name and title of the author of the document, the name and title of any recipient, and identification of anyone providing legal counsel;
 - (f) the Request(s) to which the DOCUMENT is responsive; and
 - (g) any other information required to be furnished by Fed. R. Civ. P. 26(b)(5). Provide the information requested in this instruction in a searchable and sortable electronic format and with sufficient specificity to enable the undersigned counsel and the Court to assess the applicability of the claimed privilege or protection.
4. These requests shall be deemed continuing in nature so as to require production of all additional or different DOCUMENTS or information responsive to these requests, which YOU discover, receive, or generate between the time of the original production and trial.
5. All DOCUMENTS and/or other data which relate to the subject matter of this case or these requests must be preserved. Any destruction involving such DOCUMENTS must cease, even if it is YOUR normal or routine course of business to delete or destroy such DOCUMENTS or data and even if YOU believe such DOCUMENTS or data are privileged or otherwise need not be produced.
6. Unless otherwise stated, the relevant time period for all requests are for DOCUMENTS created or originating on or after January 1, 2012.

DOCUMENT REQUESTS

- 1 1. Any and all DOCUMENTS related to (1) Hyper Engine, (2) marketing
2 and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear”
3 game (4) the “House Next Door” Marketing Campaign, (5) the CNBC
4 Vaccine Campaign, (6) Google email and/or web servers, and (7)
marketing and/or promotion of Hidden Empire Film Group films.
- 5 2. Any and all DOCUMENTS containing and/or evidencing communications
6 between YOU and Deon Taylor related to (1) Hyper Engine, (2) marketing
7 and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear”
8 game (4) the “House Next Door” Marketing Campaign, (5) the CNBC
9 Vaccine Campaign, (6) Google email and/or web servers, and (7)
10 marketing and/or promotion of Hidden Empire Film Group films,
including but not limited to emails, text messages, and other
correspondence.
- 11 3. Any and all DOCUMENTS containing and/or evidencing communications
12 between YOU and Roxanne Taylor related to (1) Hyper Engine, (2)
13 marketing and/or promotion of “Fear” film, (3) marketing and/or
14 promotion of “Fear” game (4) the “House Next Door” Marketing
15 Campaign, (5) the CNBC Vaccine Campaign, (6) Google email and/or web
16 servers, and (7) marketing and/or promotion of Hidden Empire Film Group
films, including but not limited to emails, text messages, and other
correspondence.
- 17 4. Any and all DOCUMENTS containing and/or evidencing communications
18 between YOU and Darrick Angelone related to (1) Hyper Engine, (2)
19 marketing and/or promotion of “Fear” film, (3) marketing and/or
20 promotion of “Fear” game (4) the “House Next Door” Marketing
21 Campaign, (5) the CNBC Vaccine Campaign, (6) Google email and/or web
22 servers, and (7) marketing and/or promotion of Hidden Empire Film Group
films, including but not limited to emails, text messages, and other
correspondence.
- 23 5. Any and all DOCUMENTS containing and/or evidencing communications
24 between YOU and Hidden Empire Holdings LLC (formerly known as
25 Hidden Empire Film Group) related to (1) Hyper Engine, (2) marketing
26 and/or promotion of “Fear” film, (3) marketing and/or promotion of “Fear”
27 game (4) the “House Next Door” Marketing Campaign, (5) the CNBC
28 Vaccine Campaign, (6) Google email and/or web servers, and (7)
marketing and/or promotion of Hidden Empire Film Group films,
including but not limited to emails, text messages, and other
correspondence.

- 1 6. Any and all DOCUMENTS containing and/or evidencing communications
2 between YOU and Hyper Engine, LLC related to (1) Hyper Engine, (2)
3 marketing and/or promotion of “Fear” film, (3) marketing and/or
4 promotion of “Fear” game (4) the “House Next Door” Marketing
5 Campaign, (5) the CNBC Vaccine Campaign, (6) Google email and/or web
6 servers, and (7) marketing and/or promotion of Hidden Empire Film Group
7 films, including but not limited to emails, text messages, and other
8 correspondence.
- 9 7. Any and all DOCUMENTS containing and/or evidencing communications
10 between YOU and AONE Creative, LLC (formerly known as AONE
11 Entertainment, LLC) related to (1) Hyper Engine, (2) marketing and/or
12 promotion of “Fear” film, (3) marketing and/or promotion of “Fear” game
13 (4) the “House Next Door” Marketing Campaign, (5) the CNBC Vaccine
14 Campaign, (6) Google email and/or web servers, and (7) marketing and/or
15 promotion of Hidden Empire Film Group films, including but not limited
16 to emails, text messages, and other correspondence.
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MICHAEL SWARTZ

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Michael Swartz, 10100 Santa Monica Blvd, Suite 2300, Los Angeles CA 90067

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste E-106, Costa Mesa, CA 92626; depositionclerk@ddslegal.com	Date and Time: 04/03/2023 5:00 pm
--	--------------------------------------

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

1. “YOU” or “YOUR” refers to the recipient of these requests and shall include all entities in which YOU have a financial interest, direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions, predecessors, successors, and assignees, the present and former officers, directors, employees, attorneys, agents, and representatives of any of the above, and each person acting or purporting to act on its behalf.
2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
10 used herein, all drafts or versions, and all non-identical copies of any such
11 DOCUMENT, including but not limited to those DOCUMENTS that
12 contain markings, symbols, interlineations, comments, or notations of any
13 kind on the front or back thereof.

14 GENERAL INSTRUCTIONS

- 15 1. In responding to these Requests, YOU are to furnish All available
16 information, including information in the possession, custody, or control of
17 YOUR agents and all persons acting on YOUR behalf. This includes
18 DOCUMENTS presently in the possession, custody or control of YOUR
19 attorney(s) or their investigators or any third party or parties to whom YOU
20 have surrendered possession, custody, or control, or who are acting on
21 YOUR behalf, or who have otherwise obtained possession, custody or
22 control, or who, upon YOUR request, would surrender possession, custody
23 or control to YOU.
- 24 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
25 custody or control, produce a description of each such DOCUMENT. The
26 description shall include the following:
 - 27 (a) the name of each author, sender, creator, and initiator of such
28 DOCUMENT;
 - (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - (c) the date the DOCUMENT was created;
 - (d) the date(s) the DOCUMENT was in use;
 - (e) a detailed description of the content of the DOCUMENT;
 - (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - (g) the DOCUMENT's current location.
 - (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose

instructions the DOCUMENT was destroyed or otherwise disposed of, and the date and manner of the disposal.

3. If YOU claim the attorney-client privilege, or any other privilege or protection (including but not limited to work product, deliberative process, joint defense, or common interest protections) for any Document, YOU shall provide the following information with respect to each such DOCUMENT:
- (a) a. the type of privilege claimed;
 - (b) the type of DOCUMENT;
 - (c) the general subject matter of the DOCUMENT;
 - (d) the date of the DOCUMENT;
 - (e) such other information as is sufficient to identify the DOCUMENT for a subpoena duces tecum, including, where appropriate, the name and title of the author of the document, the name and title of any recipient, and identification of anyone providing legal counsel;
 - (f) the Request(s) to which the DOCUMENT is responsive; and
 - (g) any other information required to be furnished by Fed. R. Civ. P. 26(b)(5). Provide the information requested in this instruction in a searchable and sortable electronic format and with sufficient specificity to enable the undersigned counsel and the Court to assess the applicability of the claimed privilege or protection.
4. These requests shall be deemed continuing in nature so as to require production of all additional or different DOCUMENTS or information responsive to these requests, which YOU discover, receive, or generate between the time of the original production and trial.
5. All DOCUMENTS and/or other data which relate to the subject matter of this case or these requests must be preserved. Any destruction involving such DOCUMENTS must cease, even if it is YOUR normal or routine course of business to delete or destroy such DOCUMENTS or data and even if YOU believe such DOCUMENTS or data are privileged or otherwise need not be produced.
6. Unless otherwise stated, the relevant time period for all requests are for DOCUMENTS created or originating on or after January 1, 2012.

DOCUMENT REQUESTS

- 1 1. Any and all DOCUMENTS containing and/or evidencing communications
2 between YOU and Deon Taylor related to Hyper Engine, LLC, including
3 but not limited to emails, text messages, and other correspondence.
- 4 2. Any and all DOCUMENTS containing and/or evidencing communications
5 between YOU and Roxanne Taylor related to Hyper Engine, LLC,
6 including but not limited to emails, text messages, and other
7 correspondence.
- 8 3. Any and all DOCUMENTS containing and/or evidencing communications
9 between YOU and Quincy Newell related to Hyper Engine, LLC,
10 including but not limited to emails, text messages, and other
11 correspondence.
- 12 4. Any and all DOCUMENTS containing and/or evidencing communications
13 between YOU and Hidden Empire Holdings LLC (formerly known as
14 Hidden Empire Film Group) related to Hyper Engine, LLC, including but
15 not limited to emails, text messages, and other correspondence.
- 16 5. Any and all DOCUMENTS related to and/or created for Hyper Engine,
17 LLC.
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NAMECHEAP INC.

UNITED STATES DISTRICT COURT

for the

Central District of California



Hidden Empire Holdings, LLC, et al.

Plaintiff

v.
Darrick Angelone, et al.

Defendant

Civil Action No. 2:22-cv-06515-MWF-AGR

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Namecheap Inc., 4600 E. Washington Street, Suite 305, Phoenix, AZ 85034

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment 1

Place: DDS Legal Support Systems, Inc.; 2900 Bristol St. Ste E-106, Costa Mesa, CA 92626; depositionclerk@ddslegal.com	Date and Time: 04/03/2023 5:00 pm
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/02/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ JT Fox

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants Darrick Angelone, AONE Creative LLC, and On Chain Innovations, LLC, who issues or requests this subpoena, are: JT Fox; Law Offices of JT Fox & Associates, APC; 556 S. Fair Oaks Ave., No. 444, Pasadena, CA 91105; jt@jtfoxlaw.com; (888) 750-5530

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:22-cv-06515-MWF-AGR

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

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- (i) fails to allow a reasonable time to comply;
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(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

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(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

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(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment 1

Hidden Empire Holdings, LLC, et al. v. Darrick Angelone, et al.

United States District Court – Central District of California

Case No. 2:22-cv-06515-MWF-AGR(x)

DEFINITIONS

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2. The term “DOCUMENT” or “DOCUMENTS” means all forms of tangible expression including without limitation, the following which is listed by way of example only and without limitation: correspondence, memoranda, transmittals, audit request forms, audit responses, audit reports, statements, agreements, contracts, offers, work papers, deeds, and other legal instruments, escrow instructions, drafts, telegrams, cables, facsimiles, telexes, telecopies, notes (including handwritten notes on yellow note pads), reports, studies, analyses, records, estimates, evaluations, checks, charts, ledgers, checkbooks, cancelled checks, check stubs, bills, books of account, receipts, check registers, sales slips, account credit slips, credit card receipts, bank statements, invoices, journals, accounting records, money orders, negotiable instruments, wire transfers, and other business, financial or budget records, personal credit memoranda, bank card statements, credit or charge card statements, statements, credit bureau reports, tables, tabulations, lists, compilations, summaries, indices, information stored on magnetic impulses such as floppy computer disk, hard computer disk, or other computer storage system, computer programs and data, computer printouts, abstracts, applications, licenses, appraisals, drawings, building plans, blueprints, instructions, manuals, label tags, pleadings, testimony, transcripts, affidavits, declarations under penalty of perjury, unsworn statements, filings with any court or tribunal of government agency, speeches, articles, books, papers, bulletins, advertisements, pamphlets, brochures, magazines, periodicals, newspapers, publications, calendars, appointment books, logs, files, personal records,

1 diaries, records or logs of telephone conversations, notebooks, minutes,
2 insurance policies, agendas, time sheets, employment applications,
3 resumes, personnel records, medical records, employment references,
4 diplomas, certificates, orders, photographs, photographic negatives,
5 photographic slides, moving pictures, all sound recordings, video of film
6 recordings, sound and video recordings, microfilms, microfiche, tapes,
7 recordings, transcriptions, translations of any pertinent document from
8 foreign languages into English, and other matter which contains any form
9 of communication or representation. "DOCUMENT" also includes, as
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DOCUMENT, including but not limited to those DOCUMENTS that
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12 1. In responding to these Requests, YOU are to furnish All available
13 information, including information in the possession, custody, or control of
14 YOUR agents and all persons acting on YOUR behalf. This includes
15 DOCUMENTS presently in the possession, custody or control of YOUR
16 attorney(s) or their investigators or any third party or parties to whom YOU
17 have surrendered possession, custody, or control, or who are acting on
YOUR behalf, or who have otherwise obtained possession, custody or
control, or who, upon YOUR request, would surrender possession, custody
or control to YOU.
- 18
19 2. If any responsive DOCUMENT was, but no longer is, in YOUR possession,
20 custody or control, produce a description of each such DOCUMENT. The
description shall include the following:
 - 21 (a) the name of each author, sender, creator, and initiator of such
DOCUMENT;
 - 22 (b) the name of each recipient, addressee, or party for whom such
DOCUMENT was intended;
 - 23 (c) the date the DOCUMENT was created;
 - 24 (d) the date(s) the DOCUMENT was in use;
 - 25 (e) a detailed description of the content of the DOCUMENT;
 - 26 (f) the reason it is no longer in YOUR possession, custody, or control;
and
 - 27 (g) the DOCUMENT's current location.
 - 28 (h) If the DOCUMENT is no longer in existence, in addition to
providing the information indicated above, state upon whose